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United States District Court
STATE AND DISTRICT OF MINNESOTA

MAY 03 2010

CLERK, U.S. DISTRICT COURT
ST. PAUL, MN

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

Case Number:

v.

10-mj-160(mkk)

JOSEPH JOSHUA JACKSON

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about April 29, 2010 within the exterior boundaries of the Red Lake Indian Reservation in the State and District of Minnesota, defendant(s)

did assault victim Danielle Adele King, an Indian in the torso with intent to commit murder, to wit: defendant did shoot victim, with a firearm

in violation of Title 18, United States Code, Section(s) 113(a)(1), 1151, 1152, 1153(a).

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:
SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No



Signature of Complainant
Michael Iverson
FBI

Sworn to before me, and subscribed in my presence,

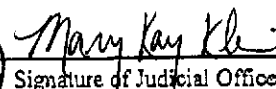
April 29, 2010
Date

The Honorable Mary Kay Klein
UNITED STATES MAGISTRATE JUDGE

Name & Title of Judicial Officer

at

Bemidji, MN
City and State


Signature of Judicial Officer

SCANNED

MAY 07 2010

U.S. DISTRICT COURT ST. PAUL

1 STATE OF MINNESOTA)

2)

3 COUNTY OF BELTRAMI) ss. AFFIDAVIT OF MICHAEL J. IVERSON

4)

5)

10-MJ-160(MKH)

6
7 1. Your affiant, Michael J. Iverson, being duly sworn,
8 does depose and state as follows:

9 2. I am a Special Agent (SA) of the Federal Bureau of
10 Investigation (FBI). I have been a Special Agent of
11 the FBI since July of 2004. I am currently assigned
12 to the Bemidji, Minnesota Resident Agency of the FBI
13 with the primary responsibility of investigating
14 violent crimes that occur on the Red Lake Indian
15 Reservation. The information contained in this
16 affidavit is based on my knowledge and on the
17 reporting and knowledge of other law enforcement
18 officers involved in this investigation.

19 3. On April 29, 2010, Red Lake Police Department (RLPD)
20 Officer Paul Kwako (Officer Kwako) and RLPD Officer
21 Harlan Johnson (Officer Johnson) responded to a
22 reported shooting victim lying near the Redby Post
23 Office on the Red Lake Indian Reservation.

24 4. Upon arriving on the scene, Officer Kwako was informed
25 by Danielle Adele King, date of birth (DOB)
26 XX/XX/1982, that she had been shot and kicked in the
27 head. King advised that Joe Jackson had kicked her.
28 King also stated, "He shot me." Jackson was
29 identified by RLPD as Joseph Joshua Jackson, date of
30 birth (DOB) XX/XX/1985.

31 5. King was transported to Red Lake Indian Health Service
32 (IHS) Hospital for medical treatment.

- 1 6. FBI Special Agent Michael Iverson (SA Iverson) and FBI
2 Special Agent Robert Mertz (SA Mertz) responded to IHS
3 and interviewed King. King advised that she had been
4 shot in the side and kicked in the head by Joe
5 Jackson.
- 6 7. SA Iverson and SA Mertz observed several staples had
7 been applied to a wound on the left side of King's
8 head. SA Iverson and SA Mertz also observed what
9 appeared to be a small-caliber gunshot wound to King's
10 right torso.
- 11 8. King advised that Jackson drove a black Explorer.
- 12 9. Officer Kwako advised that he knew Jackson to drive a
13 black Ford Explorer with gold trim along the bottom of
14 the doors, non-factory wheels, and Red Lake license
15 plate 19071.
- 16 10. RLPD advised that Red Lake license plate 19071 was
17 registered to Joseph J. Jackson. The registered
18 vehicle was listed as a Black 2002 Ford Explorer,
19 Vehicle Identification Number 1FMZU74E02UA07869.
- 20 11. King was transported to North Country Regional
21 Hospital (NCRH) for additional treatment. SA Mertz
22 was informed by NCRH Emergency Room Doctor Richard
23 Stennes (Dr. Stennes) that King did sustain a close-
24 range gunshot wound to her right-side torso.
- 25 12. I know that the location near the U.S. Post Office in
26 Redby, Minnesota, where King was found, is within the
27 exterior boundaries of the Red Lake Indian
28 Reservation.
- 29 13. I know that Danielle Adele King is an enrolled member
30 of the Red Lake Band of Chippewa Indians.
- 31 14. Based upon the above information, I believe that there
32 is probable cause to conclude that on April 29, 2010,

1 within the exterior boundaries of the Red Lake Indian
2 Reservation, Minnesota, a location within the special
3 territorial jurisdiction of the United States, Joseph
4 Joshua Jackson, date of birth (DOB) XX/XX/1985, did
5 assault Danielle Adele King, an Indian, DOB
6 XX/XX/1982, with intent to commit murder; in violation
7 of Title 18, United States Code, Sections 1151, 1152,
8 1153(a), and 113 (a)(1).

9 15. Further your affiant sayeth not.

10
11 
12

13 Michael J. Iverson
14 Special Agent
15 Federal Bureau of Investigation
16 Bemidji, Minnesota
17

18 Subscribed and sworn to before me this 29th day of April,
19 2010.

20
21 
22 U.S. Magistrate Judge
23
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